

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA and the
STATE OF TENNESSEE ex rel.
GARY ODOM and ROSS LUMPKIN,

Plaintiffs,

v.

SOUTHEAST EYE SPECIALISTS, PLLC,
SOUTHEAST EYE SURGERY CENTER,
LLC, EYE SURGERY CENTER OF
CHATTANOOGA, LLC, DARYL F. MANN,
and JOHN R. BIERLY,

Defendants.

Civil Case No. 3:17-cv-689
Chief Judge Waverly D. Crenshaw, Jr.

**SEES DEFENDANTS' UNOPPOSED MOTION TO EXCEED PAGE LIMIT
WITH RESPECT TO MOTION TO DISMISS**

Defendants SouthEast Eye Specialists, PLLC (“SEES”), SouthEast Eye Surgery Center, LLC, and Eye Surgery Center of Chattanooga, LLC (collectively, the “SEES Defendants”) file this motion seeking to exceed the page limit in connection with the SEES Defendants’ memorandum in support of the SEES Defendants’ anticipated motion to dismiss. The SEES Defendants seek an extension of five (5) additional pages in order to file a memorandum of not more than thirty (30) pages. As grounds for this motion, the SEES Defendants state as follows:

1. Relators filed their First Amended Complaint on May 6, 2021. Relators’ First Amended Complaint includes 64 pages and 241 paragraphs of allegations.
2. The SEES Defendants request an additional five pages to allow for adequate discussion of the grounds for dismissal asserted in the SEES Defendants’ anticipated motion to dismiss.

3. The SEES Defendants have conferred with Relators and Relators do not oppose the relief requested in this motion.

In light of the foregoing, the SEES Defendants respectfully request an extension of the page limit and permission to file a memorandum of not more than thirty (30) pages in support of their anticipated motion to dismiss.

Dated this 24th day of June 2021.

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that on June 24 2021, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following, and/or served the foregoing via U.S. Mail and electronic mail upon:

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